

Frequently Asked Questions

1. Who is covered under the California Accidental Release Prevention (CalARP) Program?

Any owner or operator of a stationary source that has more than a threshold quantity of a regulated substance (RS) in a process would be covered under CalARP Program. The regulated substances are listed in California Code Regulations, Title 19, Section 2770.5.

2. What is considered a process?

Process means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances, or combination of these activities. A process can involve one or more storage containers, tank farms, plating tanks, reactor vessels, distillation columns, receivers, pumps, waste treatment process, etc.

3. Once it is determined the process is under the CalARP Program, what's the next step?

Owner or operator of a stationary source must submit a Regulated Substance Registration form that is found in the Unified Program Forms, to Los Angeles County Fire Department Certified Unified Program Agency (LACoFD CUPA). The Unified Program Forms are available for download by clicking on [Forms](#).

If the RS exceeds the quantity in Table 1 or Table 2, the facility is subject to Federal ARP requirements and must submit a copy of RMP to USEPA. In addition, the facility must provide a copy of the RMP with a completed RS Registration to the LACoFD CUPA.

However, if a facility has an RS that exceeds the quantity in Table 3 but less than Table 1, the facility may be required to submit an RMP along with RS Registration to LACoFD CUPA. This agency will make a preliminary determination as to whether the handling of an RS has significant likelihood to pose an accident risk. And if the agency finds an RMP is required, the owner or operator of a facility would work closely with LACoFD CUPA to determine the appropriate level of documentation required for an RMP.

4. What are the exemptions from the Accidental Release Prevention provisions?

Ammonia is exempt from CalARP provisions when farmers use the ammonia as an agricultural nutrient. In addition, flammable substances used as fuel, or held for sale as fuel at a retail facility, are excluded from the CalARP provisions. This exclusion applies to many facilities that use liquefied petroleum gases for fuel, and to propane retail facilities. Retail facility is defined as "a stationary source at which more than

one-half of the income is obtained from direct sales to end-users or at which more than one-half of the fuel sold, by volume, is sold through a cylinder exchange program.”

5. Are there any new requirements for the year 2004 reporting cycle?

Yes. EPA amended the RMP rule on April 9, 2004 (69 FR 18819) and State OES amended the Title 19 of California Code of Regulations on June 28, 2004. The amendment requires more timely accident history reporting and corrections to emergency contact information should be made within one month; removes the requirement to briefly describe the results of off-site consequence analysis (OCA) in the Executive Summaries of RMPs; and adds three new data elements to RMPs:

- ❖ the emergency contact's e-mail address (if an e-mail address exists)
- ❖ The purpose and type of any submission that revises or otherwise affects previously filed RMPs; and
- ❖ The name, address, and telephone number of the contractor/consultant who prepared the RMP (if any).

The RS Registration form was revised to add these new data elements. All CalARP facilities are required to submit the RS Registration form along with the Business Owner/Operator Information form to comply with the new requirements. These forms are available for download by clicking on [Forms](#).

6. How has the reporting schedule for accident history information changed?

It is now required that any facility that has a reportable accident to revise Five-Year Accident History section of its RMP to include information about that accident within six months of its occurrence. In the case of accidents involving Program 2 or 3 processes, facilities must also revise the incident investigation information in their RMPs. Specifically, facilities must revise: (1) the date of investigation to reflect the date of the investigation of the accident being included in the five-year accident history; and (2) the expected date of completion of any changes due to that accident investigation, and submit a corrected RMP within six months of the date of the accident.

7. For the purposes of the five-year accident history, how is “reportable accident” defined?

The five-year accident history covers only certain releases.

The release must be from a covered process and involve a regulated substance held above its threshold quantity in the process.

The release must have caused at least one of the following:

- ❖ On-site deaths, injuries, or significant property damage;
or
- ❖ Known offsite deaths, injuries, property damage, environmental damage, evacuations, or sheltering in place.

If you have had a release of a regulated substance from a process where the regulated substance is held below its threshold quantity, you do not need to report that release even if the release caused one of the listed impacts or if the process is covered for some other substance. You may choose to report the release in the five-year accident history, but you are not required to do so.